

EXHIBIT E

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August 11, 2022

VIA EMAIL

Alina Habba
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1430 US Highway 206, Suite 240
Bedminster, NJ 07921

Re: Carroll v. Trump, 20 Civ. 07311 (LAK) (JLC)

Dear Counsel:

You will be receiving today, via secure file transfer, a production of 30,286 pages of documents bearing the Bates numbers CARROLL_000001 through CARROLL_030286. This production is made pursuant to the Protective and Confidentiality Order signed by the Court earlier today and substantially completes our document production.

Given that Defendant has taken the position that he does not intend to produce a single document responsive to Plaintiff's requests, much less documents created after the filing of Plaintiff's complaint, our production of documents that post-date the filing of this action consists only of documents that may be used by Plaintiff as evidence at trial or contain communications with potential witnesses.

Finally, enclosed please find supplemental Rule 26(a) disclosures, to be read in conjunction with our initial disclosures dated May 27, 2022.

Very truly yours,



Roberta A. Kaplan